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July 24, 2025

BY ECF

Hon. Denise L. Cote
 United States District Court
 Southern District of New York
 Daniel Patrick Moynihan Courthouse
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 New York, New York 10007

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Roger Burlingame
Partner

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Re: United States v. Keonne Rodriguez & William Hill, No. 24 Cr. 82 (DLC)

Dear Judge Cote,

On behalf of Defendant William Hill, we write with respect to the Court's order directing Mr. Hill to return to the United States no later than September 8, 2025, and to remain in the Southern and Eastern Districts of New York through trial (ECF No. 132). For the purpose of allowing Mr. Hill to attend an important medical appointment in Lisbon, we respectfully request that he be permitted to travel to the United States on September 27, 2025.

Since Mr. Hill's July 9, 2024, release on a bond to his home in Lisbon where he resides with his wife of 34 years, on conditions including real-time location monitoring by the case agents, travel restricted to Lisbon city limits, and a curfew between 7 p.m. and 6 a.m., Mr. Hill has had no violations of his conditions of release and has returned to New York for all three court appearances.

On September 26, 2025, Mr. Hill is scheduled to attend an important eye examination in Lisbon. A record confirming the appointment is attached to this letter. As stated in the confirmation, Mr. Hill is under treatment for both glaucoma and for an extraretinal membrane that has developed over his retina. He sees the doctor with whom he is meeting on September 26th twice yearly, the appointments are booked six months in advance, and the doctor is unable to move the current appointment up to see Mr. Hill earlier. In addition to the importance of the continuance of care under the same physician to maintain his eyesight – the doctor is monitoring the progression of the conditions over the period between appointments – the visit and testing will be covered by Mr. Hill's Portuguese insurance, which would not cover equivalent testing in the United States.



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To allow Mr. Hill to maintain this appointment, we respectfully request that the Court permit him to remain in Lisbon for 19 days after September 8, returning to the United States on September 27, 2025. We thank the Court for its consideration.

Respectfully submitted,

/s/ Roger A. Burlingame

Roger A. Burlingame

Attachment

Cc: All Counsel of Record (by ECF)



Name: **William Lonergan Hill**

For all due purposes and at the request of the interested, it is hereby declared that Mr. William Lonergan Hill has a scheduled appointment on the upcoming September 26, 2025.

A medical appointment is necessary for Glaucoma follow-up (under treatment) and Retina (due to the presence of an ERM).

Lisbon, 24/07/2025

CPO - Clínica Privada de Oftalmologia, SA
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Av. Liberdade 180 A - 1º
1250-146 Lisboa
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Exmo(a) Sr(a) William Lonergan Hill, a seu pedido, foi-lhe marcada uma consulta de **Ortópica - Ortopetista - Exames** para o dia **26-09-2025 às 10:20 horas**, na instituição **CPO – Clínica Privada de Oftalmologia SA**.

Deverá fazer-se acompanhar de todos os exames e informação clínica relevante.

Pedimos-lhe que compareça com 15 minutos de antecedência.

Declaração emitida por **Sandra Maria Guerreiro**.

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